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12 Attorneys for United States of America

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 OAKLAND DIVISION

16 UNITED STATES OF AMERICA,

17 Plaintiff,

18 v.

19 CARLOS ALBERTO LIMON-LOMELI,

20 Defendant.

21 ) Case No. CR 19-234 HSG

22 ) **STIPULATION AND [PROPOSED] ORDER**  
23 ) **EXCLUDING TIME UNDER THE SPEEDY**  
24 ) **TRIAL ACT**

25 The parties appeared before the Court for the first status conference in this case on June 10, 2019.

26 At that time, the Court set the matter for a motions or trial setting hearing on July 29, 2019. The  
27 government has produced discovery to the defendant, and defense counsel is in the process of reviewing  
28 that discovery. The government is also in the process of producing a small amount of additional discovery  
to the defendant.

29 For this reason, and those reasons stated on the record in this matter at the status conference held  
30 on June 10, 2019, the parties stipulate and agree that the time between June 10, 2019 and July 29, 2019  
31 should be excluded from calculation under the Speedy Trial Act for the effective preparation of counsel  
32 and that ends of justice served by any such continuance outweigh the best interests of the public and the  
33

1 defendant in a speedy trial.

2 The undersigned Assistant United States Attorney certifies that counsel for the defendant has  
3 approved the filing of this document with her electronic signature.

4 IT IS SO STIPULATED this 13th day of June, 2019.

5 DAVID L. ANDERSON  
6 United States Attorney

LAW OFFICES OF GAIL SHIFMAN

7 /s/  
NIKHIL BHAGAT  
8 Assistant United States Attorney

/s/  
9 GAIL SHIFMAN  
10 *Attorney for Carlos Alberto Limon-  
Lomeli*

11 **[PROPOSED] ORDER**

12 Based upon the representation of counsel and for good cause shown, the Court finds that failing  
13 to exclude the time between June 10, 2019 and July 29, 2019, would deny counsel the reasonable time  
14 necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §  
15 3161(h)(7)(B)(iv).

16 The Court further finds that the ends of justice served by excluding the time from June 10, 2019,  
17 through and including July 29, 2019, from computation under the Speedy Trial Act outweigh the best  
18 interests of the public and the defendant in a speedy trial.

19 Having made these findings, it is hereby ORDERED that the time from June 10, 2019 through  
20 and including July 29, 2019 is excluded from computation under the Speedy Trial Act. 18 U.S.C. §  
21 3161(h)(7)(B)(iv).

22 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

23 Dated: 6/14/2019

24   
25 HONORABLE HAYWOOD S. GILLIAM, JR.  
26 United States District Judge